

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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FALLS LAKE NATIONAL INSURANCE
COMPANY,

22-cv-1473 (KAM) (PK)

Plaintiff,

-against-

DECLARATION

KALNITECH CONSTRUCTION CORP.,
DAVS PARTNERS LLC, STALIN RODRIGO
REYES ESPINOZA and ASK ELECTRICAL
CONTRACTING CORP.,

Defendants,

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SHIRA J. BIEGACZ declares the following under penalty of perjury:

1. I am an attorney duly admitted to practice in the State of New York and in the United States Southern and Eastern Districts of New York. I am an associate attorney of Sacco & Fillas, LLP, attorneys for Kalnitech Construction Corp. (“Kalnitech”).

2. With permission of the Court, granted on December 8, 2023, the following Exhibits to Plaintiff’s L.R. Statement of Material Facts are filed as attachments to Kalnitech’s L.R. 56.1 Counterstatement of Material Facts [Doc. No. 66].

Exhibit A to Plaintiff’s L.R. Statement of Material Facts - Espinoza Complaint in First Action

Exhibit B to Plaintiff’s L.R. Statement of Material Facts - Davs' Answer in First Action

Exhibit C to Plaintiff’s L.R. Statement of Material Facts - Kalnitech's Answer in First Action

Exhibit G to Plaintiff’s L.R. Statement of Material Facts - Policy issued by Falls Lake to Kalnitech

Exhibit M to Plaintiff’s L.R. Statement of Material Facts - Kalnitech Master Subcontract

Exhibit O to Plaintiff’s L.R. Statement of Material Facts - Espinoza's Response to Plaintiff's First Set of Requests

Exhibit P to Plaintiff’s L.R. Statement of Material Facts - Jim Associates Master Subcontract Agreement

Exhibit R to Plaintiff’s L.R. Statement of Material Facts - Jim Associate's document Production

Dated: Astoria, New York

December 8, 2023

BY: /s/ Shira Biegacz

Shira J. Biegacz, Esq.

SACCO & FILLAS, LLP

Attorneys for Defendant Kalnitech Construction Corp.

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